

LPFM General Public Comments by an FM listener in Eastern Massachusetts

Dear FCC,

I was wondering when the next filing window for new LPFM applications would be opened. Can you nail down a specific date? Are the FM corporate lobbyists making you drag your heels?

I was also wondering when the useless channel separation to the 3rd adjacent would be eliminated or reduced. I'm sure you are aware that this spacing was designed for the older "cheap alarm clock" first generation FM radios that are no longer in use. The receivers of today, using such things as ceramic filters, are far more selective than ever before. It seems that the overly conservative 3rd adjacency rule is just an excuse by the big money commercial broadcasters to keep LPFM at bay. It's working, under the current antiquated rules, there are no LPFM channels available in metro areas where they are needed the most to fill cultural voids. There does seem to be plenty of LPFM channels available in rural areas so LPFMs can broadcast to the cows instead of the masses. Moo.

I noticed also that the big money has another dirty tactic up it's sleeve to keep LPFM at bay. They've been putting up a class D translators on every block possible. Translating big stations that already come in crystal clear. An example of this here in the Merrimack Valley area of NorthEastern Massachusetts is W227AM operating on 93.3Mhz with 0.003kW at 173 meters HAAT, co-located with co-owned (class B) WKLB-FM. The repeater is in spitting distance of it's 2nd upper adjacent 93.7 (class B) WQSX. How did this close spacer slip by when an LPFM cannot? Supposedly W227AM repeats co-owned WBOS, but you can't hear it even when in plain view of the tower (in WKLB-FM's blanket area?). The class D repeater is simply a placeholder on the dial so that Andover and Tewksbury (MA) can be deprived of their only possible LPFM allotment. This is just one example, and I'm sure you will find others. Here's another: What about the new class D repeater, W260AS, 99.9Mhz in Lawrence, MA. This urban city, whose majority population is Spanish speaking Hispanic, is a prime example of where an LPFM could really do some good. Lawrence has no Spanish FMs. More than 50% Spanish speaking people in a major city with no voice. For the record, I am not Hispanic, I don't speak Spanish, and I think every American should speak English as a first language. I just want to see some balance in the so called "public" FM spectrum.

Also, what about creating a 3rd LPFM class, LP1000, a 1kW LPFM class as originally planned by the FCC way back at it's inception. This thought came to me today when I was listening to a new LPFM, WSCA-LP in Portsmouth NH on 106.1 FM. Even though I was the next town over from Portsmouth, I heard a back and forth mix of them and class B co-channel WCOD located all the way down in Hyannis, MA. The LPFM co-channel separation works with your formula, but fails in actual practice against anything larger than a class A. The answer is more ERP for LPFM so that the little guy can run next to the big guy and not get trampled into the ground. At the current 30 meter HAAT, 10 watts would serve the urban areas, 100 watts would serve the suburban areas, and 1000 watts would serve the

rural areas.

This is a smaller scale of the original commercial class-A, Class-B, and Class-C FM layouts, respectively.

LPFM is also your answer to significantly reducing pirate radio broadcasters because now they have a legitimate outlet for their talents. Oh, by the way, your LPFM rule that disqualifies pirates from partaking in LPFM is also a bit up side down. It seems that their engineering experience and selfless giving would make them the perfect licensee candidates. In listening to some of these people in major metropolitan cities around the country, I found them to be very professional and providing entertaining services that are lacking on the money driven stations. LPFM can regulate them and make them legitimate if allowed in the cities and if allowed a little more flexibility with regard to spacing and power. The airwaves belong to the public, not the big rich corporations. LPFM is the most important new thing in radio since Marconi. Please don't let the big loud corporate gluttons stomp out the little voices in the name of profit.

Sincerely,  
Frank Licata  
Andover, MA